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June 5, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Peggy Kuo, U.S.M.J.
225 Cadman Plaza East
Courtroom 11C South
Brooklyn, NY 11201-1804

Re: Zubiria v. Expresito, Inc., et ano.

Case No.: 1:25-cv-1972 (PK)

Dear Judge Kuo:

This firm represents the Defendants in the above-referenced case, who write to respectfully request a sixty (60) day extension of time – until Friday, July 18, 2025 – to respond to the complaint.

Pursuant to ¶ IV(B) of this Court’s Individual Practice Rules, Defendants respectfully submit that: (i) the original deadline to respond to the complaint, according to the docket sheet, was May 20, 2025 and May 21, 2025; (ii) the reason for the request is because your undersigned needs a sufficient opportunity to investigate the allegations in the complaint and prepare an appropriate response; (iii) there have been no previous requests for an extension of this deadline; (iv) Plaintiff consents to this request; and (v) the requested extension should not affect any other scheduled dates or deadlines.

Based on the foregoing, Defendants respectfully submit that there exists both good cause and excusable neglect such that this Court should exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(B). Defendants thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
June 5, 2025

Respectfully submitted,
SAGE LEGAL LLC
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